

**To:** Jayne Carlin/R10/USEPA/US@EPA[]  
**Cc:** David Powers/R10/USEPA/US@EPA; Don Waye/DC/USEPA/US@EPA[]; on Waye/DC/USEPA/US@EPA[]  
**From:** Allison Castellan <allison.castellan@noaa.gov>  
**Sent:** Thur 10/4/2012 1:14:21 PM  
**Subject:** Re: Consolidated OR 6217 Rationale with Missing Pieces  
[graycol.gif](#)  
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Jayne--

After a quick scroll, I think all the pieces are here and your secretary didn't type more than was needed. She filled in the holes we needed her to from the consolidated doc I sent (most of the text was already in the doc I provided and she just added to). We can now start reading through to consolidate rationales (some conditions were met over two different interim decision docs) and flagging the sections that need to be updated.

Allison

On Wed, Oct 3, 2012 at 8:50 PM, Jayne Carlin <Carlin.Jayne@epamail.epa.gov> wrote:

Hi Allison, Don and Dave,

Attached is the consolidated document. I realized that my secretary misunderstood the assignment and typed way more than she needed to--which is why it took so long. I guess the next step is to flag which ones need to be updated.....

(See attached file: OR 6217 draft compiled interim dec doc.docx)

Regards,

Jayne

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Allison Castellan ---08/29/2012 07:02:15 AM---Jayne, et. al-- Just realized I hadn't saved the most recent version of the consolidated

From: Allison Castellan <allison.castellan@noaa.gov>  
 To: Don Waye/DC/USEPA/US@EPA, David Powers/R10/USEPA/US@EPA, Jayne Carlin/R10/USEPA/US@EPA,  
 Date: 08/29/2012 07:02 AM  
 Subject: UPDATED: Comsolidated rationale

Jayne, et. al--

Just realized I hadn't saved the most recent version of the consolidated word doc when I sent the attachments. Please use this version attached.

Thanks!  
 Allison

On Wed, Aug 29, 2012 at 9:47 AM, Allison Castellan <allison.castellan@noaa.gov> wrote:

All--

Here's what I was able to compile from all of OR's interim decision docs. However, many of mine are corrupted so I don't have word versions for a lot of the rationales. Don, the ones you send along seemed to have the same issues--cutting off after only one or two rationales. I've attached pdfs of all our interim decision docs (Feb 2004 and June 2008 coming separately due to file size limits). Jayne if you could work with your typist to add in the other pieces that would be great. I've noted in yellow highlights in the doc which rationales are missing and which decision doc they are from. Once we have a complete consolidated interim decision doc, we can start reading through to flag which sections will need to be updated, etc. We'll likely want to take a stab at streamlining some of the rationales, if possible, as well, since the doc is now up to 25 pg and is still missing some pieces.

This is what I'm missing....

Urban:

1. Watershed Protection and Existing Devel (latest rationale in Jan 13, 2004 doc)

Marinas:

2. Shoreline stabilization, sw runoff, fueling station design, solid waste mngt, liquid material mngt, and petroleum control (latest rationale in Feb 17, 2004 doc)
3. Sewage Facility Mngt and Maintenance (latest rationale in Feb 17, 2004 doc)
4. Fish Waste & Boat Cleaning (latest rationale in Feb 17, 2004 doc)
5. Boat Operation (latest rationale in Feb 17, 2004 doc)

Also, in looking back through OR's conditional approval, I was reminded that each conditional approval also includes a "Strategy and Evaluation" condition at the end. It addresses the need for states to develop "strategies" (later guidance on 3-pronged legal opinion approach satisfies this issue) but also notes that "Oregon will also develop and apply credible survey tools to demonstrate the ability of the State's approach to achieve implementation for these management measures. The use of credible assessment techniques is necessary in order for NOAA and EPA to evaluate, at the end of the three year period described in the March 16, 1995 guidance issued by NOAA and EPA entitled Flexibility for State Coastal Nonpoint Programs, whether the State's approach has been successful or whether new, more specific authorities will be needed."

For whatever reason (before my time) final decision docs have never specifically addressed this Strategy and Evaluation condition. I don't think we should break precedent in OR, but we need to be aware of what is says given NWEA's comments related to AWQMPs.

Allison

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[attachment "OR6217 draft compiled interim dec doc 082812.docx" deleted by Jayne Carlin/R10/USEPA/US]

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